

February 13, 2026

Breeka Li Goodlander, PWS, CERPIT
Conservation Director
Town of Franklin Conservation Commission
355 East Central Street
Franklin, MA 02038

**Re: Symphony Drive Extension
 Notice of Intent Peer Review**

Dear Ms. Goodlander:

BETA Group, Inc. (BETA) has reviewed documents and plans for the proposed construction of a single-family dwelling as part of a two-lot subdivision (the Project) off of ***Symphony Drive*** in Franklin, Massachusetts (the “Site”).

This letter is provided to present BETA’s current findings, comments, and recommendations. At this time, an onsite review has not been completed by BETA due to significant snow cover. Accordingly, comments regarding review of existing conditions and Resource Area boundaries are not included in this letter. A Site visit will be conducted by BETA once weather permits.

BASIS OF REVIEW

The following documents were received by BETA and will form the basis of the review:

- Notice of Intent entitled ***Notice of Intent***; prepared by Bay Colony Group, Inc., dated December 2025. Inclusive of:
 - Cover Letter;
 - WPA Form 3;
 - Local Forms;
 - Abutters Information;
 - Figures (USGS Locus, FEMA Flood Plain Map, and NHESP Map); and
 - Wetland Delineation Report.
- Stormwater Report entitled ***Storm Water Management Report***; prepared by Bay Colony Group, Inc., dated December 2025. Inclusive of:
 - Narrative;
 - Figures;
 - Pre- and Post-Development Analysis and Stormwater Pond Design;
 - Stormwater Worksheets;
 - Operations and Management Plan; and
 - Soil Data.
- Plans (8 Sheets) entitled ***Symphony Drive Extension***, dated December 4, 2025, prepared by Bay Colony Group, Inc.; stamped and signed by William R Buckley, Jr MA PE No. 35813 and Richard J Leslie MA PLS No.38384.

Review by BETA included the above items along with the following, as applicable:

- Site Visit on N/A

- **Massachusetts Wetlands Protection Act 310 CMR 10.00** effective October 24, 2014
- **Wetlands Protection Chapter 181 From the Code of the Town of Franklin**, dated August 20, 1997
- **Conservation Commission Bylaws Chapter 271 From the Code of the Town of Franklin**, dated July 11, 2019
- **Town of Franklin Conservation Commission Regulations**, dated October 3, 2019
- **Town of Franklin Best Development Practices Guidebook**, dated September 2016

SITE AND PROJECT DESCRIPTION

The Site consists of a 7-acre parcel located off of Symphony Drive in Franklin, Massachusetts, further identified by the Franklin Assessor's Office as Assessor's Parcel 218-020-000. The Site is bounded to the north and west by undeveloped forested areas and residential homes, and to the east and south by residential homes. Existing conditions at the Site consist of undeveloped/wooded upland and wetland complexes. The lot is generally flat with topographic relief in a west-to-east orientation.

According to the Applicant, no Resource Areas Subject to Protection and Jurisdiction under the Massachusetts Wetlands Protection Act (M.G.L. ch.131 s.40) and its implementing regulations at 310 CMR 10.00 (collectively "the Act") are present at the Site. Only Resource Areas Subject to Protection and Jurisdiction under the Town of Franklin Wetlands Protection Bylaw (Chapter 181) and its associated regulations (collectively "the Bylaw") are present at the Site including Isolated Vegetated Wetlands (IVW), the 25-foot No Disturbance Zone, the 50-foot No Build Zone, and the 100-foot Buffer Zone.

The Site is not located within Zone I, Zone II, or Interim Wellhead Protection Areas, nor is it located within Surface Water Protection Areas (Zone A, B, or C) or Outstanding Resource Waters (ORWs). There are no Areas of Critical Environmental Concern (ACEC) present, and the most recent Natural Heritage and Endangered Species Program (NHESP) mapping does not depict Priority Habitat of Rare Species or Estimated Habitat of Rare Wildlife at the Site. There are no NHESP-mapped Certified Vernal Pools or mapped within 100 feet of the Site. A Potential Vernal Pool (PVP) is mapped on the eastern side of the Site and an additional PVP (disclosed by the Applicant) is present along the western portion of the Site. According to the FEMA Flood Insurance Rate Map (FIRM) community panel number 25021C0307F, dated July 8, 2025, the Site is not located within a FEMA Flood Zone.

Natural Resource Conservation Service (NRCS) soil maps of the Site indicate the presence of Montauk fine sandy loam with a Hydrological Soil Group (HSG) rating of C.

The Applicant seeks approval for the construction of a single-family dwelling and other associated Site features within the 100-foot Buffer Zone to IVW. Proposed work within Jurisdictional Areas include the following activities (collectively referred to as the "Project"):

- Installation of erosion and sedimentation controls;
- Installation of a temporary stabilized construction entrances;
- Clearing and grubbing of portions of the Site;
- Grading of portions of the Site;
- Construction of the proposed house and stormwater drainage basin;
- Paving of the roadway and driveway;
- Installation of a stone trench adjacent to the driveway;
- Tying into local water and sewer services; and
- Stabilization of the Site.

The Project proposes 2,638 square feet of impacts to the 25-50-foot Buffer Zone and 12,012 square feet of impacts to the 50-100-foot Buffer Zone to IVW. Additional work is proposed outside of Jurisdictional Areas at the Site including construction of another single-family home and associated features that are not addressed within this review.

ADMINISTRATIVE AND PLAN COMMENTS

The plan set (as identified above) is missing information and requires additional information for clarity.

Table 1. NOI Plan

NOI Plan Requirements	Yes	No
Scale of 40'=1" or larger	✓	
North Arrow (with reference)	✓	
Topographic contours (2' intervals)	✓	
Existing Conditions Topography (with source and date of survey)	✓	
Proposed Topography	✓	
Existing and Proposed Vegetation		✓ (Comment A2.a)
Existing Structures and Improvements	✓	
Resource Areas and Buffer Zones labeled	✓	
Location of Erosion Controls		✓ (Comment A2.b)
Details of Proposed Structures	✓	
Construction Sequence and Schedule		✓ (Comment A2.c)
Registered PLS Stamp (Existing Condition Plans Only)	✓	
Assessors' Reference	✓	
Abutting Property Assessors' Reference	✓	
Survey Benchmark		✓ (Comment A2.d)
Accurate Plan Scale	✓	

PLAN AND GENERAL COMMENTS

A1. The Project was filed under the Bylaw only; therefore, no DEP file number has been issued.

A2. The following elements are missing from the provided plan set:

- a. Existing and proposed vegetation should be included on the plans as referenced in Bylaw Regulations Section 7.18.1.5 and 7.18.1.6, including individual trees/shrubs with a diameter greater than 1" proposed for removal. It is BETA's understanding that the Commission generally increases the size threshold for tree location based on the Project and therefore defers to the Commission on this matter. However, the proposed tree line, areas of proposed lawn, and any other proposed vegetation should be depicted on the plans.
- b. The proposed location of erosion and sedimentation controls are only shown on Sheet 7 of the submitted plan set. Erosion controls should be depicted on Sheet 4 of the plans with all other proposed Site elements to ensure constructability and protection of Resource Areas.
- c. A Construction Sequence with all proposed activities within Jurisdictional Areas should be provided on the plans per Bylaw Regulations Section 7.18.1.14.

d. A survey benchmark should be provided on the plans.

A3. Impacts to both the 25-50-foot and 50-100-foot Buffer Zone should be noted on the plans.

WETLAND RESOURCE AREAS AND REGULATORY REVIEW

BETA has completed a regulatory review of the submitted documents and plans, focusing on compliance with jurisdictional regulations set forth in the Bylaw. The Project is proposed within Buffer Zone to locally jurisdictional areas only and is accordingly not subject to the Resource Area Performance Standards set forth by the Act.

The NOI application generally requires the submission of additional information to meet all submission requirements of the Bylaw. In addition, the Applicant should clarify certain aspects of proposed conditions including proposed work within the 25-50-foot Buffer Zone, the extent of proposed lawn, and any Jurisdictional Areas that could potentially be re-naturalized following construction activities. At this time, the Applicant is required to provide the Conservation Commission with additional information to describe the work, and the effect of the work on the interests identified in the Bylaw.

RESOURCE AREA AND BOUNDARY COMMENTS

As noted earlier in this letter, BETA will be conducting a Site visit once ground conditions improve and will subsequently provide any resulting comments.

CONSTRUCTION & MITIGATION COMMENTS

- W1. Provide specifications of the seed mixture(s) proposed for stabilization of disturbed areas within Buffer Zone, including any areas that are proposed to be lawn. All areas of proposed lawn should be demarcated on the Project plans. BETA recommends that native species with wildlife habitat value be proposed within Buffer Zone where lawn is not required as mitigation for Buffer Zone clearing.
- W2. The Applicant should consider providing a planting plan to mitigate for additional development within Buffer Zone. Specifically, areas within Buffer Zone closest to the IVW boundary should be prioritized for the planting of native vegetation and the application of native seed mix.
- W3. The Commission could include a Special Condition in the order of Conditions requiring the submission and approval of a dewatering plan prior to discharge in the event that groundwater is encountered.
- W4. On Sheet 7 of the plans, line work associated with erosion and sedimentation controls and the limit of clearing are shown; however, the limits of work is not shown in the vicinity of the Buffer Zone impacts. The Applicant should confirm if the limits of erosion controls are the same as the limits of work in this area and depict this on the plans.
- W5. The Project proposes to clear vegetation and grade within approximately 2,638 square feet of the 25-50-foot Buffer Zone; however, no Site elements are proposed for construction in this area. The Applicant should provide further details addressing what is proposed within this area and determine if these impacts are necessary.
- W6. Inlet protection within the catch basins along Symphony Drive should be depicted on the Erosion Control Plan.

WPA PERFORMANCE STANDARDS COMMENTS

The Project does not propose any work within Resource Areas Subject to Protection under the Act; therefore, the Project is not required to comply with Performance Standards under the Act.

BYLAW REGULATORY COMMENTS

- W7. A Construction Sequence should also be provided on the Plans per Bylaw Regulation Section 7.15.1.
- W8. The Applicant should provide an Erosion & Sedimentation Control Plan which includes contact information of the person(s) responsible for inspecting and maintaining erosion controls, the requirement to inspect erosion controls weekly or following significant rain events, and all other requirements listed in Section 7.12.1 of the Bylaw Regulations.
- W9. A Mitigation Plan with information outlined in Bylaw Regulation Section 7.11 should be provided.
- W10. A Vernal Pool Statement should be provided per Bylaw Regulations Section 7.7.
- W11. According to Section 7.9.1 of the Bylaw, the Project Narrative should include the following missing content:
- a. All activities required to construct the Project;
 - b. How the Project will affect the Functions and Characteristics outlined in Section 7 of the Regulations;
 - c. The entity performing the work; and
 - d. When the proposed activities will be completed.

STORMWATER MANAGEMENT

The Project is currently undergoing stormwater management review through the Planning Board review process.

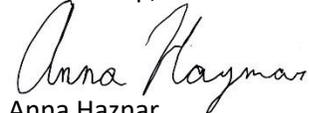
REVIEW SUMMARY

Based on our review of the NOI submittal and Project plans, the Applicant is required to provide the Conservation Commission with additional information to describe the work and the effect of the work on the interests identified in the Bylaw.

If we can be of any further assistance regarding this matter, please contact us at our office.

Very truly yours,

BETA Group, Inc.



Anna Haznar
Scientist



Jonathan Niro, PWS
Project Manager

cc: Amy Love, Town Planner
Matt Crowley, P.E., BETA